

Joseph H. Harrington
Acting United States Attorney
Eastern District of Washington
Caitlin A. Baunsgard
Assistant United States Attorney
Post Office Box 1494
Spokane, WA 99210-1494
Telephone: (509) 353-2767

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WASHINGTON

UNITED STATES OF AMERICA,

Plaintiff,

V.

CHARICE MARIE UNRUH,

Defendant.

Case No.: 2:21-cr-00108-WFN

Motion for Detention

The United States moves for pretrial detention of Defendant, pursuant to 18 U.S.C. § 3142(e) and (f).

1. Eligibility of Case. This case is eligible for a detention order because the case involves (check one or more):

- Crime of violence (as defined in 18 U.S.C. § 3156(a)(4) which includes any felony under Chapter 109A, 110 and 117);
 - Maximum penalty of life imprisonment or death;
 - Drug offense with maximum penalty of 10 years or more;

1 Felony, with two prior convictions in above categories;
2 Felony that involves a minor victim or that involves the possession or
3 use of a firearm or destructive device as those terms are defined in 18 U.S.C.
4 § 921, or any other dangerous weapon, or involves a failure to register under 18
5 U.S.C. § 2250;

- 6 Serious risk Defendant will flee; or
7 Serious risk obstruction of justice.

8 2. Reason for Detention. The Court should detain Defendant because
9 there is no condition or combination of conditions which will reasonably assure
10 (check one or both):

- 11 Defendant's appearance as required; or
12 Safety of any other person and the community.

13 3. Rebuttable Presumption. The United States will invoke the rebuttable
14 presumption against Defendant under 18 U.S.C. § 3142(e). The presumption
15 applies because there is probable cause to believe Defendant committed:

- 16 Drug offense with maximum penalty of 10 years or more;
17 An offense under 18 U.S.C. §§ 924(c), 956(a), or 2332b;
18 An offense under 18 U.S.C. §§ 2332b (g)(5)(B) for which a
19 maximum term of imprisonment of 10 years or more is prescribed;

- An offense under chapter 77 of Title 18, United States Code, for which a maximum term of imprisonment of 20 years or more is prescribed;
- An offense involving a minor victim under 18 U.S.C. §§ 1201, 1591, 2241, 2242, 2244(a)(1), 2245, 2251, 2251A, 2252(a)(1), 2252(a)(2), 2252(a)(3), 2252A(a)(1), 2252A(a)(2), 2252A(a)(3), 2252A(a)(4), 2260, 2421, 2422, 2423, or 2425;
- Other Circumstance as defined in 18 U.S.C. § 3142(e)(2).

4. Time for Detention Hearing. The United States requests the Court conduct the detention hearing:

- At the first appearance, or
- After a continuance of three days.

5. Other Matters.

Dated: August 18, 2021.

**Joseph H. Harrington
Acting United States Attorney**

s/ Caitlin A. Baunsgard
Caitlin A. Baunsgard
Assistant United States Attorney